

Commonwealth of Kentucky
Division for Air Quality
PERMIT STATEMENT OF BASIS

Title V draft permit, No. V-98-028
A. O. Smith Electrical Product Company
636 Holt Drive, Scottsville, Kentucky 42164
May 3, 2000
Completed by: Ashiq Zaman

SOURCE DESCRIPTION, CONTROL EQUIPMENTS & CONSTRUCTION DATE:

Emissions Unit 01 (01): Stator Processes:

a) Stator core bonding line:

Equipments include: In line dip station, BGK IR bake oven, BGK oven holding section,
BGK oven cooling section

b) Stator core bonding process:

Equipments include: stator stack assembly, dip stations, cure ovens, and air cool &
disassembly for both 30 and 40 frame stators

c) 30 Frame dip process:

Equipments include: ovens, dip/spin tanks, bake ovens, and air cool

d) 40 Frame dip process:

Equipments include: ovens, dip/spin tanks, bake ovens, and air cool

Construction commenced: modified in December 1996

Emissions Unit 02 (05): Selectreat System #1

Equipments include: preheat ovens, mix tank, applicator, cure oven, and air cooling system

Construction commenced: after 1983

Emissions Unit 03 (18): Mini Selectreat System

Equipments include: preheat oven, mix tank, trickle treat, cure oven, and bake ovens

Construction commenced: after 1990

Emissions Unit 04 (23): Selectreat System #2

Equipments include: preheat ovens, mix tank, applicator, cure oven, and air cooling system

Construction commenced: after 1994

Emissions Unit 05 (31): Rotor Grinding Process

Equipments include: Center less grinders, coolant feed rate, coolant filtration system, coolant
recirculation pump, and waste bin

Construction commenced: after 1994

Control equipment: Mist collector

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REGULATION APPLICABILITY:

All the applicable regulations to the emission units are listed in the permit. The following regulations are not applicable based on the applicability of the regulations, applicability dates, and/or commencement dates:

Regulations not applicable to emissions units 01(01), 02(05), 03(18), and 04(23):

Regulation 401 KAR 59:595, Standards of performance for surface coating of metal furniture, incorporating 40 CFR 60, Subpart EE, since the stators are not part of metal furniture.

Regulation 401 KAR 60:390, Standards of performance for automobile and light-duty truck surface coating operations, incorporating 40 CFR 60, Subpart MM, since the units are not located at automobile or light-duty truck assembly plant.

Regulation 401 KAR 60:460, Standards of performance for metal coil surface coating, incorporating 40 CFR 60, Subpart TT, due to definition of metal coil surface coating operation.

Regulation 401 KAR 61:060, Existing sources using organic solvents, for unit located in a Priority Region III for photochemical oxidants which commenced before June 29, 1979 but on or after April 9, 1972, due to applicability dates.

Regulation 401 KAR 61:090, Existing automobile and light-duty truck surface coating operations, due to definition of affected facility. Units are not part of assembly plant.

Regulation 401 KAR 61:132, Existing miscellaneous metal parts and products surface coating operations, due to applicability date and applicability provisions in Section 2, since Allen County is attainment for ozone pursuant to 401 KAR 51:010.

Regulations not applicable to emissions units 02(05) and 03(18):

Regulation 401 KAR 59:225, New miscellaneous metal parts and products surface coating operations, applicable to a coating line located at job shops and original equipment manufacturing industries which apply coatings on metal substrates not elsewhere subject to regulation in this chapter due to applicability date of the regulation.

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COMMENTS:

- The permittee has not proposed any alternate operating scenario for any of the emission units.
- This permit does not impose any emission cap on any of the emissions units.
- This permit proposes no limits on volatile organic compounds for emissions units 01 and 04 based on Regulation 401 KAR 59:225 since the bonding compound meets the exemption requirements of Regulation 401 KAR 59:225, Section 6(1)(b).
- The permittee shall analyze the bonding product using Method 24 as described in 40 CFR 60, Appendix A to verify that the coating meets the exemption requirements of Regulation 401 KAR 59:225, Section 6(1)(b). The division may approve any alternate procedure for analyzing coatings on a case by case basis. However, any alternate procedure that has not been previously authorized by EPA shall be submitted to EPA as a SIP revision.
- The permittee will be required, for emissions units 01 and 04, to assure compliance with the record keeping requirements of Regulation 401 KAR 59:225.
- No regulation applies to emissions units 02 and 04.
- The emissions unit 05 is subject to Regulation 401 KAR 63:010, Fugitive emissions and is considered to be in compliance when using control measures required by the regulation.
- This permit contains provisions which require that specific test methods, monitoring or record keeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.